

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

United States of America,

Case No. 9:22-cr-00658-RMG

v.

Russell Lucius Laffitte,

Defendant.

**DEFENDANT'S MOTION AND MEMORANDUM IN SUPPORT
THEREOF FOR AUTHORIZATION TO ISSUE A SUBPOENA DUCES TECUM FOR
THE PRODUCTION BEFORE TRIAL OF CERTAIN RECORDS AND DOCUMENTS**

Pursuant to Federal Rule of Criminal Procedure 17(c), the Defendant, Russell Lucius Laffitte, hereby moves this Court for the authorization to issue a subpoena duces tecum for the pre-trial production of documents and communications of The Hobbes Group, P.A. (hereinafter "Hobbes Group"), related to the topics listed in the proposed subpoena, which is attached to this motion as Exhibit 1. Notice was provided to the United States Attorney and has no objection.

The Defendant's subpoena is a narrowly drawn, good faith attempt to obtain documents admissible in his defense, which are not accessible to the Defendant in any other way. Access to these documents in advance of trial is necessary in order to avoid delays at trial and to ensure that the Defendant will have access to these documents in time to adequately prepare his defense. The Defendant has met the requirements for this Court to authorize the issuance of a subpoena duces tecum for these records.

For the foregoing reasons, the Defendant respectfully moves this Court for authorization to issue a subpoena duces tecum for the pre-trial production of certain records and documents regarding PMPED. A proposed order is attached as Exhibit 2.

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